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10 *Attorneys for Plaintiff, Wilmington Trust, National Association, Not In Its Individual Capacity*
11 *But As Trustee Of ARLP Securitization Trust, Series 2014-2*

12 **UNITED STATES DISTRICT COURT**
13 **DISTRICT OF NEVADA**

14 WILMINGTON TRUST, NATIONAL
15 ASSOCIATION, NOT IN ITS INDIVIDUAL
16 CAPACITY BUT AS TRUSTEE OF ARLP
17 SECURITIZATION TRUST, SERIES 2014-2,

18 Plaintiff,

19 vs.

20 STEWART INFORMATION SERVICES
21 CORP.; STEWART TITLE GUARANTY
22 COMPANY; DOE INDIVIDUALS I through
23 X; and ROE CORPORATIONS XI through
24 XX, inclusive,

25 Defendants.

26 Case No.: 2:21-cv-01880-APG-VCF

27 **STIPULATION AND ORDER TO**
28 **EXTEND TIME PERIOD TO**
RESPOND TO STEWART
INFORMATION SERVICES CORP.'S
MOTION TO DISMISS [ECF No. 5]

29 **[First Request]**

30 COMES NOW Plaintiff, Wilmington Trust, National Association, Not In Its Individual
31 Capacity But as Trustee of ARLP Securitization Trust, Series 2014-2 ("Wilmington Trust") and
32 Defendant Stewart Information Services Corp. ("SISC"), by and through their counsel of record,
33 hereby stipulate and agree as follows:

34 1. On September 14, 2021, Wilmington Trust filed its Complaint in Eighth Judicial District
35 Court, Case No. A-21-840990-C [ECF No. 1-1];
36 2. On October 12, 2021, Defendants filed a Petition for Removal to this Court [ECF No. 1];
37 3. On October 12, 2021, SISC filed its Motion to Dismiss for lack of personal jurisdiction
38 [ECF No. 5];

1 4. Wilmington Trust's deadline to respond to SISC's Motion to Dismiss is currently October
2 26, 2021;
3 5. Wilmington Trust is requesting a brief extension until Wednesday, November 3, 2021, to
4 file its response to the Motion to Dismiss;
5 6. This extension is requested to allow the Parties additional time to review and file a
6 stipulation to stay litigation pending the Ninth Circuit's resolution of an appeal in *Wells
7 Fargo Bank, N.A. v. Fidelity National Title Ins. Co.*, Ninth Cir. Case No. 19-17332
8 (District Court Case No. 3:19-cv-00241-MMDWGC) (the "Wells Fargo II Appeal"). The
9 Parties anticipate that the Ninth Circuit Court of Appeals' decision in the *Wells Fargo II*
10 Appeal may touch upon issues involved in the instant litigation;
11 7. Counsel for SISC does not oppose the requested extension;
12 8. This is the first request for an extension which is made in good faith and not for purposes
13 of delay.

14 **IT IS SO STIPULATED.**

15 DATED this 26th day of October, 2021.
16 WRIGHT, FINLAY & ZAK, LLP

17 /s/ Lindsay D. Dragon
18 Lindsay D. Dragon, Esq.
19 Nevada Bar No. 13474
20 7785 W. Sahara Ave., Suite 200
21 Las Vegas, NV 89117
22 *Attorneys for Plaintiff, Wilmington Trust,
23 National Association, Not In Its Individual
24 Capacity But As Trustee Of ARLP
25 Securitization Trust, Series 2014-2*

15 DATED this 26th day of October, 2021.
16 MAURICE WOOD

17 /s/ Brittany Wood
18 Brittany Wood, Esq.
19 Nevada Bar No. 7562
20 8250 West Charleston Blvd., Suite 100
21 Las Vegas, Nevada 89117
22 *Attorney for Defendants Stewart
23 Information Services Corp. and Stewart
24 Title Guaranty Company*

23 **IT IS SO ORDERED.**

24 DATED this 27th day of October, 2021.

25 
26

27 UNITED STATES DISTRICT JUDGE